

John E. Selent
502-540-2304
john.selent@dinslaw.com

June 27, 2006

RECEIVED

JUN 28 2006

PUBLIC SERVICE
COMMISSION

Via First Class Mail

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

Re: *In the Matter of Mountain Rural Telephone Cooperative Corporation, Inc. v. Kentucky AllTel, Inc. Case No. 2006-00198*

Dear Ms. O'Donnell:

Mountain Rural Telephone Cooperative Corporation, Inc. ("Mountain Telephone") has received Kentucky AllTel Inc.'s ("AllTel") proposed procedural schedule. Mountain Telephone opposes the entry of this procedural schedule, or any other at this time, due to: (i) the pendency of its motion for summary judgment; (ii) the expense involved in unnecessary discovery; and (iii) the lack of any support in the record substantiating AllTel's attempt to harass Mountain Telephone with discovery.

No amount of discovery will change the fact that AllTel is not paying Mountain Telephone's tariffed switched access service charges, and this is the basis of Mountain Telephone's motion for summary judgment.

Unlike every other carrier in the state, AllTel refuses to pay for switched access services, including carrier common line ("CCL") charges, associated with AllTel's so-called and self-styled "ACS" traffic. In so doing, AllTel is using Mountain Telephone's services for free and exposing other interexchange carriers ("IXC") to an unfair competitive disadvantage while requiring Mountain Telephone's customers and members to subsidize AllTel's calling plans. This is just not right.

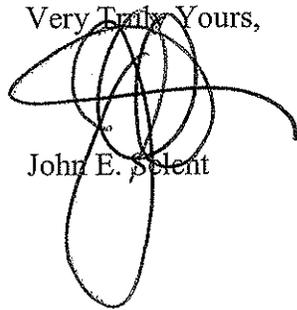
Finally, recognizing that the Public Service Commission has many other pressing matters to which it must attend, Mountain Telephone sees no reason for the Commission to be encumbered by a July 10, 2006 commencement date for discovery, as proposed by AllTel in its tendered procedural schedule. Instead, the entry of a procedural schedule, if any, should not

Hon. Beth O'Donnell
June 27, 2006
Page 2

occur until the Commission has had adequate time to consider and rule on Mountain Telephone's pending motion for summary judgment. This would be most consistent with judicial economy, and the economy of the parties.

Thank you, and if you have any questions, please call me.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "John E. Spent". The signature is highly stylized and scribbled, with multiple overlapping loops and lines.

John E. Spent

JES

cc: Amy E. Dougherty, Esq.
Kimberly Bennett, Esq.
Mark R. Overstreet, Esq.
Daniel Logsdon, Esq.

1400 PNC Plaza, 500 West Jefferson Street
Louisville, KY 40202

Dinsmore & Shohl LLP
ATTORNEYS

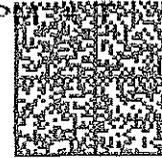
LOUISVILLE KY 400

27 JUN 2006 P

RECEIVED

JUN 28 2006

PUBLIC SERVICE
COMMISSION



UNITED STATES POSTAGE
PITNEY BOWES
02 1A \$ 00.39⁰
0004608059 JUN 27 2006
MAILED FROM ZIP CODE 40202

Hon. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

40601+8294

